

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION
CIVIL ACTION NO.: 5:20-CV-00165-KDB-DCK**

**A.G., individually and as the Natural
Parent and Legal Guardian of L.G., a
Minor,**

Plaintiffs,

v.

**THE CITY OF STATESVILLE,
MICHAEL FATTALEH, in his
individual capacity, COLLEEN
GUERIN a/k/a COLLEEN FLOOD, in
her individual capacity, and WILLIAM
MANNERS, in his individual capacity,**

Defendants.

**PLAINTIFF'S
EXHIBIT LIST**

Pursuant to the Court's Pretrial Order and Case Management Plan [Doc. #59], Plaintiff A.G., individually and as the Natural Parent and Legal Guardian of L.G., a Minor ("Plaintiff"), respectfully identifies the following exhibits they intend to introduce during the trial of this action:

Exhibit No.	Description	Identified by	Admitted
1.	Statesville Police Department Case Report		
2.	Statesville Police Department Use of Force Report		
3.	Statesville Police Department Internal Affairs Investigation Report		
4.	Pressly Alternative School Surveillance Video		
5.	Officer Fattaleh Body Cam Video		
6.	Documentation of Seclusion or Restraint May 18, 2018		
7.	Documentation of Seclusion or Restraint May 29, 2018		
8.	Documentation of Seclusion or Restraint August 27, 2018		
9.	Documentation of Seclusion or Restraint September 11, 2018		

10.	Documentation of Seclusion or Restraint September 12, 2018		
11.	Second Documentation of Seclusion or Restraint September 12, 2018		
12.	Officer Michael Fattaleh Statement to Internal Affairs		
13.	Colleen Guerin Statement September 11, 2018		
14.	Colleen Guerin Statement September 24, 2018		
15.	William Manners Statement September 11, 2018		
16.	Mark Vaughn Statement September 12, 2018		
17.	SBI Interview of Officer Elliot Turner		
18.	SBI Interview of Officer Michael Fattaleh		
19.	SBI Interview of Captain Thomas Souther		
20.	SBI Interview of Sergeant Rambo		
21.	SBI Interview of Colleen Guerin		
22.	SBI Interview of William Manners		
23.	SBI Interview of Mark Vaughn		
24.	SBI Interview of Mark Grega		
25.	SBI Interview of Bobbie Samuels		
26.	SBI Interview of A.G.		
27.	Recording of Conversation with A.G., Capt. Souther, and Sgt. Rambo		
28.	Spreadsheet of Arrests by the City (Response to Interrogatory No. 14)		
29.	School Resource Officer Program Memorandum of Understanding		
30.	Statesville Police Department Policy on Use of Force		
31.	Statesville Police Department Policy on Conduct		
32.	Officer Michael Fattaleh CV		
33.	Officer Michael Fattaleh Training List		
34.	Officer Michael Fattaleh Training Certificates (Non-Firearm)		
35.	Officer Michael Fattaleh Daily Observation Report 10/9/2017		
36.	Officer Michael Fattaleh Daily Observation report 10/11/2017		
37.	Officer Michael Fattaleh Daily Observation Report 10/13/2017		
38.	Officer Michael Fattaleh March 20, 2018 Employee Performance Appraisal		
39.	Officer Michael Fattaleh May 24, 2018 Employee Performance Appraisal		

40.	Officer Michael Fattaleh September 18, 2018 Resignation Letter		
41.	Statesville Police Department Affidavit of Separation for Officer Michael Fattaleh		
42.	Colleen Guerin CV		
43.	Colleen Guerin Training Record		
44.	William Manners CV		
45.	William Manners Training Record		
46.	2020 Letter Certifying Manners as CPI Certified Instructor		
47.	Exceptional Children Team Minutes July 31, 2018		
48.	July 31, 2018 FBA		
49.	July 31, 2018 BIP		
50.	August 1, 2018 IEP		
51.	Exceptional Children Team Minutes November 13, 2018		
52.	November 30, 2018 IEP		
53.	Meeting Minutes for L.G. Meeting on December 17, 2018		
54.	December 18, 2018 IEP		
55.	Notes for the IEP Meeting Minutes on January 14, 2019		
56.	January 15, 2019 IEP		
57.	Homebound Review Form December 17, 2018		
58.	Homebound Review Form January 14, 2019		
59.	January 28, 2019 Email from A.G. to Mark Grega		
60.	Iredell-Statesville Schools Speech Language Evaluation Report / Summary of Evaluation and Eligibility Worksheet – Autism / Summary of Evaluation and Eligibility Worksheet – Other Health Impairment / Specific Learning Disability – Combined Screenings and Evaluations / Eligibility Determination		
61.	Iredell-Statesville Schools July 25, 2018 Confidential Psychological Evaluation Report		
62.	Iredell-Statesville Schools July 31, 2018 Confidential Psychological Evaluation Report		
63.	Children's Hope Alliance Records		
64.	Array of Brighter Beginnings Psychological Evaluation		
65.	David S. Bathory April 23, 2018 Psychological Evaluation		
66.	Bathory International PLLC Medical Records		

67.	Pediatric Advanced Therapy Medical Records		
68.	Integrative Wellness Medical Records		
69.	Developmental & Behavioral Pediatrics of the Carolinas Medical Records		
70.	Salisbury Pediatric Associates Medical Records		
71.	Davis Regional Medical Center Medical Records		
72.	Davis Regional Medical Center Bills		
73.	Turning Point Family Services Medical Records		
74.	Turning Point Family Services Bills		
75.	The ERC Center Medical Records		
76.	The ERC Bills		
77.	Brenner's Children's Hospital Medical Records		
78.	Brenner's Children's Hospital Bills		
79.	Atrium Health Carolinas Psychiatry Davidson/Behavioral Health Davidson Medical Records		
80.	Atrium Health Carolinas Psychiatry/Behavioral Health Davidson Bills		
81.	Atrium Behavioral Health – Charlotte Medical Records		
82.	Atrium Behavioral Health – Charlotte Bills		
83.	Current Medicaid Lien		
84.	Photographs of L.G.'s Injuries		
85.	March 28, 2019 Approval of Supplemental Security Income Benefits for L.G.		
86.	A.G. Tax Returns		
87.	Excerpts and Exhibits from the 30(b)(6) Deposition of the City (David Onley)		
88.	Excerpts and Exhibits from the 30(b)(6) Deposition of the City (Ron Smith)		
89.	Excerpts and Exhibits from the 30(b)(6) Deposition of the City (Thomas Souther)		
90.	Excerpts and Exhibits from the Deposition of David Onley		
91.	Excerpts and Exhibits from the Deposition of Thomas Souther		
92.	Excerpts and Exhibits from the Deposition of Elliott Turner		
93.	Excerpts and Exhibits from the Deposition of William Manners		
94.	Excerpts and Exhibits from the Deposition of Colleen Guerin		
95.	Excerpts and Exhibits from the Deposition of Michael Fattaleh		

96.	Excerpts and Exhibits from the Deposition of Bobbie Samuels		
97.	Excerpts and Exhibits from the Deposition of Mark Grega		
98.	Excerpts and Exhibits from the Deposition of Mark Vaughn		
99.	CV of Dr. David Husted		
100.	Expert report of Dr. David Husted, and supporting documents		
101.	CV of Sharon Reavis		
102.	Expert report of Sharon Reavis, and supporting documents		
103.	CV of Dr. J.C. Poindexter		
104.	Expert report of Dr. J.C. Poindexter, and supporting documents		
105.	N.C.G.S. § 8-46 Mortality Table		
106.	U.S. Department of Education Office for Civil Rights, Data Snapshot: School Discipline, Issue Brief No. 1: (Mar. 2014)		
107.	Personal photographs, school records, cards, etc. of L.G.		
108.	Any exhibit used during a deposition taken during this case		
109.	Defendants' Discovery Responses, including Requests for Admission		
110.	Any illustrative or demonstrative exhibits which assist with illustrating a witness's testimony.		
111.	Any exhibit necessary for rebuttal		

Plaintiff reserves the right to introduce any exhibits identified or used by any Defendant, and reserves the right to identify and introduce rebuttal and impeachment exhibits as necessary.

This the 22nd day of August, 2022.

JAMES, McELROY & DIEHL, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **PLAINTIFF'S EXHIBIT LIST** has this date been served upon counsel for Defendants via email and by depositing a copy in the United States Mail, postage prepaid, addressed as follows:

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This the 22nd day of August, 2022.

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